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March 24, 2020

Honorable Stewart D. Aaron
United States Magistrate Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: Jon R. Morgan v. Crutchfield New Media, LLC,
No. 1:19-cv-11724-JPO-SDA

Dear Magistrate Judge Aaron:

We represent the Defendant in the above-captioned matter. Plaintiff's counsel filed today what he characterized as a "joint" motion to stay. Unfortunately, that is not correct. The version that was filed was not shared with Defendant's counsel, and when a prior version was shared, I informed Plaintiff's counsel that it was not accurate and needed to be revised. I had previously requested that any letter motion to stay filed with the Court be shared with me first.

Defendant does not object to the 30-day enlargement sought by Plaintiff, but does not join the motion and does not believe the motion sufficiently describes our position. In light of the current Covid-19 pandemic and the fact that Defendant is located in Virginia, its lead counsel is located in Maine, and Plaintiff and his counsel are located in New York, all of which are under various government restrictions, Defendant first requested that Plaintiff dismiss this case without prejudice until the pandemic passes. After Plaintiff declined that suggestion, Defendant suggested that all deadlines be stayed until the President rescinds the current declaration of national emergency. Defendant believes this approach better lessens the burdens on the parties and the Court in these unprecedented times.



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Thank you for your consideration in this matter.

Very truly yours,

BRANN & ISAACSON

/s/ Peter J. Brann

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cc: Jonathan Shalom